

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:  
CARLTON L. WOODSON  
TRACEY P. WOODSON

§  
§  
§  
§

Case No. 18-30930  
( Chapter 7 )

**MOTION FOR RELIEF FROM THE STAY REGARDING EXEMPT PROPERTY**

THIS IS A MOTION FOR RELIEF FROM THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF FROM THE AUTOMATIC STAY, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT NOT LATER APRIL 23, 2019 AND YOU MUST ATTEND THE HEARING.

THE COPY SENT TO THE MOVANT MUST BE DELIVERED BY HAND OR ELECTRONIC DELIVERY IF IT IS SENT LESS THAN SEVEN BUSINESS DAYS PRIOR TO THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE HEARING MAY BE AN EVIDENTIARY HEARING AND THE COURT MAY GRANT OR DENY RELIEF FROM THE STAY BASED ON THE EVIDENCE PRESENTED AT THIS HEARING. IF A TIMELY OBJECTION IS FILED, THE COURT WILL CONDUCT A HEARING ON THIS MOTION ON APRIL 30, 2019 AT 9:30 A.M. IN COURTROOM 403 LOCATED AT 515 RUSK AVEVUE, HOUSTON, TEXAS.

1. This motion requests an order from the Bankruptcy Court authorizing the person filing this motion to foreclose on or to repossess the property that is identified in paragraph 3.
2. Movant: CARVANA, LLC.
3. Movant, directly or as agent for the holder, holds a security interest in: 2013 HYUNDAI SANTA FE, VIN: KM8SR4HF8DU007786.
4. Movant has reviewed the schedules filed in this case. The property described in paragraph 3 is claimed as non-exempt by the debtor. Movant does not contest the non-exemption.
5. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): Motor Vehicle Loan.
6. Debtor's scheduled value of property: \$14,450.00.
7. Movant's estimated value of property: \$13,625.00
8. Total amount owed to movant: \$26300.41.
9. Estimated equity (paragraph 7 minus paragraph 8): <-\$12,675.41>.
10. Total pre and post-petition arrearages: \$18,368.00.
11. Total post-petition arrearages: \$656.00
12. Amount of unpaid, past due property taxes, if applicable: N/A.
13. Expiration date on insurance policy, if applicable: Unknown.

14. ☒ Movant seeks relief based on the debtor(s)' failure to make payments. Debtor(s)' payment history is attached as Exhibit "A." Movant represents that the attached payment history is a current payment history reflecting all payments, advances, charges and credits from the beginning of the loan. Movant further represents that the payment history is self-explanatory or can be interpreted by application of coding information that is also attached. Movant acknowledges that the Court may prohibit the use of parol evidence to interpret a payment history that does not satisfy these representations.
15. ☒ Movant seeks relief based on the debtor(s)' failure to provide a certificate of insurance reflecting insurance coverage as required under the debtor's pre-petition contracts.
16. Name of Co-Debtor: N/A.
17. Based on the foregoing, movant seeks termination of the automatic stay [and the co-debtor stay, if applicable] to allow movant to foreclose or repossess the debtor(s)' property and seeks to recover its costs and attorneys' fees in an amount not to exceed the amount listed in paragraph 9.
18. Movant certifies that prior to filing this motion an attempt was made to confer with the Debtor(s)' counsel (or with Debtor(s), if *pro se*) either by telephone, by e-mail or by facsimile, by the following person on the following date and time: On April 3, 2019 I sent a detailed email to Law Firm of Min Kim, PLLC concerning the relief sought by Movant. No agreements have been reached prior to the filing of this Motion. If requested by debtor or debtor's counsel, a payment history in the form attached to this motion was provided at least two business days before this motion was filed.

Date: April 05, 2019

/s/Travis H Gray  
Jack O'Boyle | SBN: 15165300  
S.D. Bar No.434578  
Travis H. Gray | SBN: 24044965  
S.D. Bar No. 115733  
Chris Ferguson | SBN: 24069714  
S.D. Bar No. 1760109  
**JACK O'BOYLE & ASSOCIATES**  
P.O. Box 815369  
Dallas, TX 75381  
P: 972-247-0653 | F: 972-247-0642  
E: [ecf@jackoboyle.com](mailto:ecf@jackoboyle.com)  
Attorneys for CARVANA, LLC

**CERTIFICATE OF SERVICE AND CERTIFICATE OF COMPLIANCE WITH BLR 4001**

A copy of this motion was served on the persons shown on Exhibit "1" at the addresses reflected on that exhibit on April 5, 2019 by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

/s/Travis H Gray  
Jack O'Boyle  
Travis H. Gray  
Chris Ferguson



Case Number: 18-30930

18-30930|Atlas Acquisitions LLC |294 Union St.|Hackensack, NJ 07601-4303|  
 18-30930|GFC Lending, LLC | ||||undeliverable  
 18-30930|OCWEN LOAN SERVICING, LLC | ||||undeliverable  
 18-30930|PRA Receivables Management, LLC |PO Box 41021|Norfolk, VA 23541-1021|  
 18-30930|Sheldon Ridge Homeowners Association, Inc. |7170 Cherry Park Dr|Houston, Tx  
 77095-2713|  
 18-30930|4|United States Bankruptcy Court|PO Box 61010|Houston, TX 77208-1010|  
 18-30930|ACS/Aelma |ATTN: Bankruptcy|PO Box 7051|Utica, NY 13504-7051|  
 18-30930|AT&T Mobility II LLC |%AT&T SERVICES INC.|KAREN A. CAVAGNARO PARALEGAL|ONE  
 AT&T WAY, SUITE 3A104|BEDMINSTER, NJ. 07921-2693|  
 18-30930|Ad Astra Recovery |ATTN: Bankruptcy|7330 W 33rd St Suite 118|Wichita, KS  
 67205-9370|  
 18-30930|Afni |ATTN: Bankruptcy|PO Box 3427|Bloomington, IL 61702-3427|  
 18-30930|Amsher Collection |ATTN: Bankruptcy|4524 Southlake Pkwy Suite  
 15|Birmingham, AL 35244-3271|  
 18-30930|Atlas Acquisitions LLC |294 Union St.|Hackensack, NJ 07601-4303|  
 ||duplicate  
 18-30930|Attorney General of the US |US Department of Justice|10th and  
 Constitution|NW Room 5111|Washington, DC 20530-0001|  
 18-30930|Avid Acceptance |ATTN: Bankruptcy|6995 Union Park Ctr Suite 450|Midvale, UT  
 84047-6145|  
 18-30930|Baylor College of Medicine |ATTN: Bankruptcy|Po Box 4800|Houston, TX  
 77210-4800|  
 18-30930|Bayshore Medical Center |Resurgent Capital Services|PO Box 1927|Greenville,  
 SC 29602-1927|  
 18-30930|Capella University |ATTN: Bankruptcy|225 South 6th St 9th  
 Floor|Minneapolis, MN 55402-4319|  
 18-30930|Capital One |ATTN: Bankruptcy|PO Box 30285|Salt Lake City, UT 84130-0285|  
 ||  
 18-30930|Carlton L Woodson |16107 Sheldon Ridge Way|Houston, TX 77044-6043|  
 18-30930|Certified Recovery Sys |ATTN: Bankruptcy|6161 Savoy Dr Suite 600|Houston,  
 TX 77036-3339|  
 18-30930|Check City |ATTN: Bankruptcy|PO Box 970028|Orem, UT 84097-0028|  
 18-30930|ChexSystems |Attention: Consumer Relations|7805 Hudson Road #100|Saint  
 Paul, MN 55125-1595|  
 18-30930|Community Resource Credit Union |ATTN: Bankruptcy|PO Box 3181|Baytown, TX  
 77522-3181|  
 18-30930|Conn Appliances, Inc. |c/o Becket and Lee LLP|PO Box 3002|Malvern PA  
 19355-0702|  
 18-30930|Convergent Outsourcing |ATTN: Bankruptcy|PO Box 9004|Renton, WA 98057-9004|  
 ||  
 18-30930|Directv, LLC |by American InfoSource LP as agent|4515 N Santa Fe  
 Ave|Oklahoma City, OK 73118-7901|  
 18-30930|ERC/Enhanced Recovery |ATTN: Bankruptcy|8014 Bayberry Rd|Jacksonville, FL  
 32256-7412|  
 18-30930|Financial Corp of America |ATTN: Bankruptcy|12515 Research Blvd Bldg 2,

## ncrs\_addresses

Suite 100|Austin, TX 78759-2247| ||  
 18-30930|GFC Lending LLC |PO Box 29018|Phoenix, AZ 85038-9018| |||  
 18-30930|GFC Lending, LLC | PO BOX 29018| PHOENIX, AZ 85038-9018|  
 |||duplicate  
 18-30930|Grand Canyon University |ATTN: Office of General Counsel|3300 W Camelback Rd|Phoenix, AZ 85017-1097| ||  
 18-30930|HCFS Healthcare Financial |ATTN: Bankruptcy|3585 Ridge Park Dr|Akron, OH 44333-8203| ||  
 18-30930|Harris County TRA |Linebarger Goggan Blair & Sampson LLP|c/o John P. Dillman|P O Box 3064|Houston, TX 77253-3064| |  
 18-30930|Harris County TRA |P.O. Box 3064|Houston, Tx. 77253-3064| |||  
 18-30930|INTERNAL REVENUE SERVICE |P O Box 7346|Philadelphia PA 19101-7346| |||  
 18-30930|Internal Revenue Service |2970 Market Street|Mailstop 5-Q30-133|Philadelphia, PA 19104-5002| ||  
 18-30930|Internal Revenue Service |P.O. Box 7346|Philadelphia, PA 19101-7346| |||duplicate  
 18-30930|INTERNAL REVENUE SERVICE|CENTRALIZED INSOLVENCY OPERATIONS|PO BOX 7346|PHILADELPHIA PA 19101-7346|||preferred  
 18-30930|Jacinto Medical Group |ATTN: Bankruptcy|PO Box 2429|Baytown, TX 77522-2429| ||  
 18-30930|JEFFERSON CAPITAL SYSTEMS LLC|PO BOX 7999|SAINT CLOUD MN 56302-7999|||preferred  
 18-30930|Law Firm of Min Gyu Kim PLLC |2100 West Loop South, Suite 805|Houston, TX 77027-3522| |||  
 18-30930|MIDLAND FUNDING LLC |P.O. BOX 2011|Warren MI 48090-2011| |||  
 18-30930|Memorial Hermann |ATTN: Bankruptcy|PO Box 4370|Houston, TX 77210-4370| ||  
 18-30930|Midland Funding LLC |PO Box 2011|Warren MI 48090-2011| |||duplicate  
 18-30930|Mohamed S Ahmed, MD |ATTN: Bankruptcy|4201 Garth Rd Suite 212|Baytown, TX 77521-3155| ||  
 18-30930|OCWEN LOAN SERVICING, LLC |ATTN: BANKRUTPCY DEPARTMENT|P O BOX 24605|WEST PALM BEACH, FL 33416-4605| ||  
 18-30930|Ocwen Loan Servicing |ATTN: Bankruptcy|PO Box 24605|West Palm Beach, FL 33416-4605| ||  
 18-30930|Ocwen Loan Servicing |c/o Codillis & SStawiarski PC|400 N Sam Houston Pkwy East Suite 900|Houston, TX 77060-3531| ||  
 18-30930|PRA Receivables Management, LLC |PO Box 41021|Norfolk, VA 23541-1021| |||duplicate  
 18-30930|Plaza Services |110 Hammond Drive, Suite 110|Atlanta, GA 30328-4806| |||  
 18-30930|PORTFOLIO RECOVERY ASSOCIATES LLC|PO BOX 41067|NORFOLK VA 23541-1067|||preferred  
 18-30930|Quest Diagnostics |ATTN: Bankruptcy|PO Box 7306|Hollister, MO 65673-7306| ||  
 18-30930|Receivables Performance |ATTN: Bankruptcy|PO Box 1548|Lynnwood, WA 98046-1548| ||  
 18-30930|Sheldon Ridge HOA |ATTN: Bankruptcy|7170 Cherry Park Dr|Houston, TX 77095-2713| ||  
 18-30930|Sheldon Ridge HOA |c/o Tamara L Simich|PO Box 131837|Spring, TX 77393-1837| ||

## ncrs\_addresses

18-30930|South Lake Houston EMS |ATTN: Bankruptcy|PO Box 691363|Houston, TX  
77269-1363| ||

18-30930|Southwest Credit Systems |ATTN: Bankruptcy|4120 International Pkwy Suite  
1100|Carrollton, TX 75007-1958| ||

18-30930|SPOTLOAN|PO BOX 927|PALATINE IL 60078-0927|||preferred

18-30930|Steller Recovery Inc |ATTN: Bankruptcy|4500 Salisbury Rd Suite  
105|Jacksonville, FL 32216-8035| ||

18-30930|Synchrony Bank |ATTN: Bankruptcy Dep|PO Box 965060|Orlando, FL 32896-5060|  
||

18-30930|TXU Energy Retail Company LLC |CO Bankruptcy Department|PO Box  
650393|Dallas TX 75265-0393| ||

18-30930|TELECHECK SERVICES INC|P O BOX 6806|HAGERSTOWN MD 21741-6806|||preferred

18-30930|Texas Children's Pediatrics |ATTN: Bankruptcy|PO Box 841969|Dallas, TX  
75284-1969| ||

18-30930|Tracey P Woodson |16107 Sheldon Ridge Way|Houston, TX 77044-6043| |||

18-30930|Transworld Systems Inc |ATTN: Bankruptcy|500 Virginia Dr Suite 514|Fort  
Washington, PA 19034-2707| ||

18-30930|U.S. Department of Education |c/o FedLoan Servicing|P.O. Box  
69184|Harrisburg, PA 17106-9184| ||

18-30930|US Department of HUD |451 7th Street S.W.|Washington, DC 20410-0001| |||

18-30930|US Dept of Education |c/o FedLoan Servicing|PO Box 69184|Harrisburg, PA  
17106-9184| ||

18-30930|US Trustee |Office of the US Trustee|515 Rusk Ave|Ste 3516|Houston, TX  
77002-2604| |

18-30930|US Trustee |515 Rusk, Suite 3516|Houston, TX 77002-2604| |||

18-30930|United Community CU |ATTN: Bankruptcy|PO Box 606|Galena Park, TX  
77547-0606| ||

18-30930|United Community Credit Union |ATTN: Bankruptcy|PO Box 606|Galena Park, TX  
77547-0606| ||

18-30930|William E. Heitkamp |William E. Heitkamp|Chapter 13 Trustee|9821 Katy  
Freeway, Suite 590|Houston, TX 77024-1294| |

18-30930|Carlton L Woodson |14633 Woodson Park Dr|Apt 2013|Houston, TX 77044 |||

18-30930|Eva S Engelhart |Ross Banks May Cron and Cavin PC|7700 San Felipe|Suite  
550|Houston, TX 77063-1618| |

18-30930|Min Gyu Kim |Law Firm of Min Gyn Kim PLLC|2100 West Loop South|Suite  
805|Houston, TX 77027-3522| |

18-30930|Tracey P Woodson |14633 Woodson Park Dr|Apt 2013|Houston, TX 77044 |||

Total Labels 77